

AMENDED Exhibit 18

PLAINTIFFS' OMNIBUS OPPOSITION TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT

Case No.: 4:22-md-03047-YGR

MDL No. 3047

In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation



The Role of the Teen in Shaping a Ho...



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The Role of the Teen in Shaping a Household's Experience of Instagram

Executive summary

Context: The [Household Ecosystem study](#) was a multi-method approach to understand how the use of social media products, like Instagram, impacts a household. We looked across teen and preteen siblings and their parents/guardians and discovered yet another reason **why teens matter for Instagram: Teens shape the household's perception of Instagram.**

Insight #1: Teens were often the reason other household members joined Instagram.

- **Implication:** One member within a household has the power to influence acquisition and retention for others. Family-first acquisition strategies are proven effective (e.g. TikTok) and warrant exploration on IG.

Insight #2: Teens strongly influenced preteens' understanding of what and how frequently to share on Instagram, even discouraging them from sharing due to permanence or content context.

- **Implication:** If this holds at scale, teens could be creating sharing barriers for upcoming generations including that being spontaneous/authentic doesn't belong on IG and that IG is more for consuming than sharing. We need to understand IG myths circulating among teens to inform comms and shift the perception of sharing on IG.

Insight #3: Teens indirectly impacted a household's perception of Instagram through their behavior on and off platform. Seeing a teen use filters, deliberate before posting, obsess over metrics, engage in isolation, or use a secondary account translated to well-being concerns for parents and sharing implications for preteens (noted above).

- **Implication:** As a company we need to think beyond the single user. Recognizing the influence close relationships/household members can have over others' perception and usage, we should be positioned to challenge certain mental models when necessary (e.g. posts need to meet a certain standard of perfection). We can do this by providing more transparency and value-prop understanding through age-based onboarding and family-oriented marketing. We should continue to invest in well-being from both a feature and communication standpoint.

Setting the stage

Historically, teens have been a key focus for IG. Acquiring and maintaining them continues to be a priority, reflected by investment in new features like Reels. Additionally, capturing the teen user cohort on IG is critical as we think about Instagram's role within the broader family of apps.

Learnings from the [Household Ecosystem study](#)*, offer a new perspective on why teens matter to the IG ecosystem. **Teens are not only contributors/consumers themselves, but they're also critical in shaping IG usage and perception for a household.**

**The Household Ecosystem study was a six-month primary research study with 18 rural and urban families from across 12 cities in the US. The methodology included 64 remote interviews with family members (mom, dad, teen, preteen, the occasional grandparent), 14 remote dyad interviews, 8 in-home ethnographies, and 7 remote ethnographies.*

When it comes to IG you can think of the teen as the nucleus of the household. The teen serves as the information and administrative center of the family, **informing everyone else's experience on IG by impacting perception and usage across generations.**

Teens influence acquisition and onboarding

Teens inspire acquisition within a household **because they are typically the first within a household to join**. In many cases, they're also critical to the onboarding process for parents and preteens alike.

The most common reason for a parent to join IG was to be able to learn and participate in this part of their teen's world. They joined to better understand the app, see what their child shared, and observe who their child followed.

*I signed up for IG because my daughter signed up for IG. I signed up for Snapchat because my son wanted to go on Snapchat. **Because I want to see what's in their feeds and what kind of security there is in what they're subjected to.** - dad, MA*

Older teens were IG catalysts for preteens. Most preteens became curious about and wanted an IG account because of their older sibling. In some cases, preteens even relied on their older sibling to create and set up their account, seeking their guidance on a username, profile photo, and accounts to Follow.

*I brought [IG] up to my brother and my brother said "Let's do it". **So he taught me how to use it.** Of course, with my parents' permission. - preteen, CA*

So what?

If we're looking to acquire (and retain) new users we need to recognize a teen's influence within the household to help do so, and the potential ripple effect (e.g. a teen shows a parent who then shows a grandparent).

However, there's also risk in that **one member of a household has the power to influence acquisition and retention for others**. I.e. If a teen were to abandon the app would a parent still feel inclined to join? Would a preteen (the next generation of IG teens) be excited to join if their older sibling wasn't using IG?

Therefore, it's important we not only understand a teen's role in acquisition but also **how teen retention impacts the retention of others**.

Now what?

In thinking about company growth, we should not only be focused on acquiring and retaining teens, but also be proactively looking for opportunities to introduce other generations to IG (without reliance on the teen to do so).

One way to approach this is by leveraging the physical household space to inspire app participation. TikTok does this especially well by marketing itself as a family app, encouraging participation within a household. We heard examples of cross-generation TikTok adoption after witnessing the physical/real life component (i.e. singing and moving together). In comparison, IG is very individual heavy leading to mainly solo participation. Beyond Reels, how can we ignite offline, collaborative behaviors in order to draw new users online?

What we need to better understand

We need to understand risk in having an app be used by an entire household. Namely, are teens able to maintain spaces that feel sacred to them (and their friends) or do we see decreased usage or new behavior patterns emerge as household members join? If Mom starts using an app all the time, the app can lose a "cool" factor, if we're not conscious of separation. **Preservation of protected spaces will require:**

- Learning how to create spaces within the app where teens feel like they have privacy both from their own parents but also privacy from non-peers (e.g. Aunt Sally, neighbor down the street, teachers, etc.).
- Finding opportunities, such as close friends where teens have their own, protected peer communities.
- Understanding the value of certain features being more complex (i.e. indirectly made for teens because more challenging for parents or preteens). Both Snapchat and TikTok are somewhat confusing to parents, in turn affording teens a protected place to play/engage.

Additional product opportunities/needs

The reliance on teens to onboard both parents and preteens identified an unmet onboarding/NUX need. Beyond account setup, knowing who to follow, which profile picture to choose, how to use and think about each surface, and what/ when to comment are all examples of guidance being provided by the teen within a household (and not by IG).

There is a need for structured education, mentorship, and guidance from IG for new users to fulfill a need often being inexpertly handled by the teen.

Teens influence sharing behaviors - *both directly and indirectly*

Preteens were interested in joining IG to share and receive feedback on photos and to participate with their older siblings; however, teens were quick to caution and educate their younger siblings about norms of sharing on IG. **Teens strongly influenced preteens' understanding of what and how frequently to share on IG, even discouraging them from sharing due to permanence or content context.**

I helped him pick a username and told him, "Don't be posting all the time." Just, I guess, the unspoken social media etiquette. Don't be annoying and then just be safe online it's there forever. - teen, CA

We saw a few examples (notably within larger and non-Caucasian households) where parents explicitly saw **older siblings as responsible for younger siblings' IG content.**

I told them you're putting him on [IG], so you're responsible for what he does on there. Because whatever he wants to do, he needs help to put it on there. That means that one of the siblings would have had to put it on there or taught him how to put it on there. - mom, TX

Influence over preteen sharing began when accounts were created (ie. Teens warned that posting is permanent and preteens should not post things they would later regret) and **continued as preteens became familiar with the app and their desire to share increased:** (i.e. Teens, often embarrassed by a younger sibling's post, gave feedback that they should not post so frequently and that they should post higher quality and more diverse content).

I was just going in search of a picture of a monkey, and I posted it and then she told me not to post that, because it was weird....So I was like, "Okay..." and now I ask her what would be good to post, and then she says, "yeah" or "no." - preteen, CA, in a dyad with sister

He'd just post anything that was on his camera roll. He'd post a picture of him when he was little. I mean, it was cute, but he just posted it with no caption, and I'm like, "When you post something you should have a reason for wanting to post it." - teen, CA, in a dyad with brother

I follow [my brother] and I make sure that his pictures are always at least good enough. Sometimes he posts pictures and they're very cringey and they

have no point of it and I say he should take it down." - teen, CA

Unbeknownst to teens, preteens' sharing expectations and norms were also indirectly influenced by their older sibling's online and offline behaviors:

Teen behavior	----->	Preteen translation
Teen asks family members' feedback on posts prior to posting	----->	"There's high standards for posting"
Teen discusses how a post performed, asks family members to support their post (Like/Comment), and/or deletes underperforming posts.	----->	"It's important to receive a strong response to post and if it's not getting the desired attention I should delete it" "How well a post performs impacts my sibling's mood"

So what?

Teens' direct cautions and communication of risks to younger siblings, coupled with their own sharing behaviors **could be creating barriers to sharing for preteens** including:

- That posts need to meet a certain standard of perfection
- That being spontaneous/authentic doesn't belong on Instagram
- That Instagram is more for consuming than creating
- That one shouldn't over share/post on Instagram

And contributing to an **overall perception** that IG is a **curated and higher stakes app** where people share (in moderation) only the best side of themselves.

I don't know how to get a perfect picture Like my sister says you need to post. - [REDACTED], preteen, FL

Now what?

- We need to understand if this influence over preteen sharing holds at scale, and if so, **what is our sizing estimate of preteens that are influenced by older teen siblings?** If it is common that teens are discouraging preteens from sharing, there are obvious



implications for creation and the ecosystem both in the near and longer-term as teens are the next generation coming onto the platform.

- Supplementary - at **what point do preteens begin to deviate from the mental model set by their older sibling** and lean into learned experience using the platform as well as advice from preteen peers?
- We should improve our understanding of current **myths circulating about IG, especially among teens**. This will enable us to be both proactive and reactive in our messaging, and strategically leverage ranking in support of our intended narratives. For example:
 - If teens believe that IG = permanency and perfection, **how might we better define permanence of Stories vs Feed in our messaging to help encourage spontaneity within certain features?**
 - In ranking, does **non-filtered content, stories/photos created from camera, or communal initiatives like #nofiltertuesday** need to be up-leveled to combat perfectionism expectations?
 - When developing creation tools and capabilities how can we **inspire authenticity and encourage Creators to set an example?**

Teens influence family members perception of Instagram through their own behaviors

A teen's behavior has indirect implications for the ecosystem that isn't necessarily observable in the data. Both parents and preteens reported being impacted by observation of the teen's behaviors both off and on IG.

While teens' behaviors seemed to primarily have sharing implications for preteens (as touched on above), **teens' actions translated to well-being concerns for parents:**

	Teen behavior	Parent translation	Illustrative quote
Creation	• Teen asks family members' feedback on posts prior to posting	• "Is IG diminishing my child's self esteem?"	• <i>She will take pictures of herself, selfies and she'll ask me, "Mom, I have seven pictures. Will you help me pick the best three?" And I'll sit with her and I'll help her pick it out. I don't want her to feel that she's doing it to get a like out of certain people.</i>
	• Teen creates using filters	• "I'm worried about young people using filters to change their appearance. The prevalence of filters is distorting beauty norms. I just want my teen (and my teen's peers) to accept themselves for who they are."	• <i>She just posted pictures yesterday. And, compared to the original, she had a very light skin. She made herself have a beautiful glow. She asked me, "Do I really look like that?" I said, "No, you don't." I said, "You look more like the actual one that was fixed" ..It's mentally abusive to them.</i>
Metrics + Feedback	• Teen discusses a post's performance, seeks family members' support posts (Like/Comment), and/or deletes underperforming posts	• "Is IG causing my child to be insecure?"	• <i>One of my biggest concerns for my daughter is how much it can make her feel insecure. My daughter's beautiful, very smart, athletic. But she tends to be that kind of person that says, "guess how many likes I got on the picture, my post."</i>
	• Teen discusses how many followers they have, sometimes in comparison with others	• "My teen is unduly focused on vanity metrics and competitiveness, and it's causing my preteen to focus on counts when they get started."	• <i>They're obsessed with getting followers. It's a competitive thing. My little one just got IG a few months ago and he's like, "Oh, mom, I have 140 followers now."</i>
Solo participation	• Teen creates a secondary account, often making other household members aware of them for the first time	• "I'm realizing that I'm not privy to everything my teen does on the platform and that worries/upsets me. I trust my kid but I worry what they might be hiding."	• <i>She doesn't let me follow her private account. Only her real one. I've asked her about it, but she tells me that it's nothing.</i>
	• Teen limits others family members' access to their content by creating finstas, hiding Stories from family, or blocking family members from their accounts	• [Parents and Preteens alike] "This contributes to me perceiving IG's culture as intimate, secretive, or exclusive."	• <i>My sister tried to follow me, but I did not like her following me. She commented on all my stuff, and it was annoying. So I blocked her.</i>
	• Teen engages in isolation on IG for extended periods of time. <i>Note: Engagement on IG is quieter and more solitary than other platforms which prioritize videos, music, singing, dancing, and collaboration.</i>	• "I get worried anytime my child is too quiet for too long."	

So what?

Influenced by teen observation, parents perceived IG as an app for posting for feedback and one that may foster low-self-esteem and jealousy. Parents weren't as focused on the authentic self-expression aspect of Instagram nor did they perceive IG as a place for younger generations to develop hobbies or to learn.

Now what?

There is a lot more research, product, and comms work needed in terms of how to mitigate perception risk without removing value for teens, but here are a few thoughts:

- **Project Daisy - Do we need to revisit the metric discussion?** Are there certain metrics (e.g. likes) that might have negative well-being implications, but others (e.g. comments) where there's benefit in seeing the numbers?
- **Well-being - Ongoing investment in well-being** is necessary both in the tools we provide to teens and the communication of our products at the household level.
- **Filters - The assortment of filters available** speaks to the breadth of creativity on the platform (which is awesome), but should we be more discerning in the types of filters available to different user cohorts? For example, should teens' filters bias towards



more playful than beautifying? Additionally, what **opportunities are there for filters to** **increase engagement with viewers** (i.e. less about beautifying more about interactivity)?

- Secondary accounts - **Parents did not have an understanding of the importance of secondary accounts to teens**, nor did they perceive them as potential opportunities for learning, interest pursuit, safe self-expression, bonding with close friends, or authenticity. Instead, they were associated with secretiveness or suggestive content. **We need education/comms to help frame product potential in a way that fills voids parents might be seeing (i.e. IG is not for hobbies).**
- Individual versus collaborative behaviors - We heard examples of household delight when family members created or shared familial content on IG. **What are existing behaviors like collaborative creation and sharing that could be bolstered** helping improve/change the perception of Instagram within the household?

For more insight into Parents' Social media needs and implications for Instagram please refer to the following.

Next steps

In order to be more proactive, we need to think about growth, sharing behaviors, well-being, and even perception of IG beyond a single user. In doing so, **we uncover social dynamics across close relationships that influence how people think about and use IG overtime.**

As noted throughout, there's a lot of opportunity for both research and product work and it's necessary work. Communication technology and preteen/teen usage of it is constantly evolving. Household Ecosystems are top of mind like never before given stay-at-home and WFH mandates. It's critical we keep a pulse on IG's place in this rapidly changing social media environment and on IG's specific role within the Family of Apps.

Resources

Additional learnings from the Household Ecosystem Study can be found here:

- [Parents' social media needs and implications for Instagram](#)
- [Households & IG: Experiential Needs](#)





